

ROTHMAN, SCHNEIDER, SOLOWAY & STERN, LLP

Attorneys at Law
100 Lafayette Street, Suite 501
New York, NY 10013

Franklin A. Rothman
Jeremy Schneider
Robert A. Soloway
David Stern

Tel: (212) 571-5500
Fax: (212) 571-5507

Rachel Perillo

June 7, 2023

By ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Mustapha Raji
19 Cr. 870 (JMF)

Dear Judge Furman:

I am the attorney for Mustapha Raji, the defendant in the above-named matter. This letter is respectfully submitted without objection from the government, by AUSA Catherine Ghosh, to request an adjournment of sentencing, which is presently scheduled for June 15, 2023.

As the Court is likely aware, Mr. Raji suffers from several medical conditions, including various heart conditions, stage 4 kidney disease, high blood pressure and sleep apnea. Most recently, Mr. Raji was taken to The Brooklyn Hospital Center on May 22 where he underwent numerous tests, including a transesophageal echocardiogram (TEE). On May 25 he returned to Brooklyn Hospital for a follow up with a cardiologist. It was determined that there is a valve perforation in the left ventricle of his heart, and he was diagnosed with severe mitral regurgitation, a new and worsening condition in which 50% of the blood in the heart leaks backwards. Doctors recommended that Mr. Raji undergo a coronary angiogram to be followed by cardiothoracic surgery at Mount Sinai Hospital as soon as possible. Follow up appointments with nephrologists have also been scheduled in relation to his stage 4 kidney disease.

An adjournment of sentencing is needed because a review of Mr. Raji's recent medical records from Brooklyn Hospital is necessary in order to effectively prepare for his sentencing. The records have been requested but it is unlikely that we will receive them prior to June 15. Accordingly, it is respectfully requested that sentencing be postponed to July 20, 2023 in the afternoon (a date that is preferable to counsel), or in the alternative, to July 18 at any time, to allow time to obtain and review Mr. Raji's updated medical records.

Hon. Jesse M. Furman
June 7, 2023
Page Two

If the Court has any questions regarding this application please do not hesitate to contact me.

Respectfully submitted,
/s/
Jeremy Schneider

cc: Robert Sobelman, Catherine Ghosh,
Jilan Kamal, *Assistant United States Attorneys*
(by ECF)